

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

NOV 26 1996

Federal Communications Commission
Office of Secretary

In the Matter of

Advanced Television Systems
and Their Impact Upon the
Existing Television
Broadcast Service

)
)
)
)
)
)

MM Docket No. 87-268

DOCKET FILE COPY ORIGINAL

COMMENTS OF GRANT BROADCASTING GROUP

Grant Broadcasting Group ("Grant") respectfully submits its comments in the above-captioned proceeding. Grant is the umbrella name for eight companies commonly-controlled by broadcaster Milton Grant. These companies are the licensees of eight television stations located in the eastern and midwestern regions of the country.¹

I. FLEXIBILITY

Grant believes it is imperative that the Commission maintain flexibility in development of the Allotment Table. Such an approach will ensure fairness and permit improvements to the Table. There is still much to be learned about DTV technology and its practical implementation. The Commission's processes must provide the Commission and the

¹ They are: WZDX(TV), Huntsville, Alabama, licensed to Huntsville Television Acquisition Corp.; KJMH(TV), Burlington, Iowa, licensed to Burlington Television Acquisition Corp.; KLJB-TV, Davenport, Iowa, licensed to Quad Cities Television Acquisition Corp.; WFXR-TV, Roanoke, Virginia and WJPR(TV), Lynchburg, Virginia, licensed to Grant Broadcasting System II, Inc.; WNYO-TV, Buffalo, New York, licensed to Grant Television Inc.; and WLAX(TV), LaCrosse, Wisconsin and WEUX(TV), Chippewa Falls, Wisconsin, licensed to Grant Media Inc.

045

industry with the ability to respond to technological developments and to adapt to particular circumstances relevant to individual stations and markets.

II. DATABASE ACCURACY

Grant is also concerned that the data upon which the Commission relies must be accurate. For example, we believe that one of the Grant stations has been designated with the incorrect antenna height in the FCC's proposed Table. Specifically, the antenna HAAT for Station KLJB-TV, Davenport is listed in the Commission's Table as 168.0 meters, while the station's license contains an HAAT of 990 feet, or 302 meters. This kind of discrepancy could severely prejudice the DTV allocation for KLJB-TV.

In addition, we have reviewed the Commission's Table on existing NTSC coverage areas, including areas and populations, and have found that in some instances, our stations have larger coverage contours (serve greater areas and populations) than the contours extrapolated by the Commission. If the Commission decides to determine DTV service areas based on replicating existing service areas, it must carefully ensure that the coverage contour data it is utilizing accurately corresponds to stations' actual coverage contours.

Another area affecting database accuracy is data from pending applications. Grant believes that the Commission needs to ensure that its Table includes data from applications for facilities changes that were on file prior to applicable cut-off dates. Specifically, in the case of Grant Station WZDX(TV), Huntsville, the Commission coverage data ignores an application filed January 11, 1996 requesting a site change and power increase. The application requested an increase in ERP to reach a service area of 27,986 square kilometers (up from 19,681 square kilometers) and a population of 999,000 people (up from 725,000). It also

requested an increase in antenna height above average terrain from 515 meters to 580 meters.

These proposed changes are not reflected in the Commission's proposed Table.

III. EQUALITY

Grant believes that this proceeding offers the Commission a unique opportunity to level the playing field for UHF and VHF stations. Limiting DTV coverage to that which is comparable to the station's NTSC coverage prolongs inequities which result from the more favorable propagation characteristics of the VHF NTSC signal, as compared to the UHF NTSC signal. Codifying these inequities in a new DTV Allocation Table will unfairly hamper the UHF broadcaster's ability to remain competitive in the market. In the NTSC arena, fiscal pressures resulting from higher power consumption and installation costs for traditional high power UHF transmitters have often forced UHF stations to compromise coverage. In many cases, directional antennas have been utilized to increase effective radiated power in lieu of augmenting transmitter power. With the implementation of DTV, the Commission has the opportunity to remove these inequities. Such action would serve not only UHF broadcasters, but also the public interest in that it would result in a wider variety of free television choices for viewers. If the Commission determines that service replication shall be the basis for the DTV Table, Grant urges it to build flexibility into the Table to permit those stations with smaller service areas to maximize coverage once the transition to and development of DTV is completed.

IV. ADJACENT CHANNEL ASSIGNMENTS

Grant also has a concern with respect to adjacent channel allocations. For example, in the Commission's Table, Grant station WFXR-TV, Roanoke has been assigned Channel 14, although there is already an existing NTSC Channel 15 in the market. We believe that there is likely to be substantial interference between these channels.² Moreover, the Commission proposes use of Channels 17 and 18 for DTV in Roanoke — creating the potential for severe adjacent channel interference. Similarly in Buffalo, Grant's station WNYO-TV has been assigned Channel 43 for DTV, while another station has been assigned Channel 42. Grant believes that wherever possible, adjacent channel allotments should be avoided.

V. ASSIGNMENT OF CHANNELS 3 AND 4

The Commission itself has recognized problems with use of Channels 3 and 4 for DTV given the use of these channels for VCR and cable set-top box purposes. We are concerned that the assignment of Channel 3 for WJPR(TV) in Lynchburg, Virginia is problematic. Another concern is that Channel 3 is outside the "core" spectrum. This channel will have to move to a channel within the core spectrum after the transition period. Assuming the permanent channel will be one of the channels in the FCC's present plan, all of the RF system, and probably the transmitter itself, will need to be replaced when the station moves to its permanent DTV channel. At best, one transition to DTV will require considerable venture capital, with no return on investment for several years. An additional transition vastly complicates this process. The

² Channel 14 is also undesirable due to filtering required to protect land mobile communications. The additional filtering will introduce group delay and other anomalies to the station's signal.

capital required may preclude purchase of state-of-the-art studio equipment and hamper the station's ability to compete in the market. These concerns argue in favor of expanding the core spectrum so as to provide for greater flexibility in channel allotments and usage. Otherwise, special procedures or compensatory measures should be utilized for broadcasters receiving an allotment outside the core spectrum.

VI. CONCLUSION

Grant submits the foregoing comments in an effort to apprise the Commission of the problems confronting its stations as a result of the proposals in the FCC's Allotment Table. It has also participated in and is a signatory to the joint comments being submitted by a cross-section of the industry's broadcast television stations and networks. It recognizes the efforts of the Commission to work through the many issues associated with the transition of television broadcasting from NTSC to DTV and appreciates this opportunity to comment.

Respectfully submitted,

GRANT BROADCASTING GROUP

By: Milton Grant /urs
Milton Grant
President

November 26, 1996